

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 4:25-CR-00344 HEA SRW |
| |) | |
| YEPPERSON PINZON SUAREZ, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Matthew T. Drake, Acting United States Attorney for the Eastern District of Missouri, and Colleen Lang, Assistant United States Attorney for said District, and moves for pre-trial detention in this matter and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et. seq.

As and for its grounds, the Government states as follows:

Defendant is charged with felony assault of a federal employee with contact, in violation of 18 U.S.C. Section 111(a). The Defendant represents a danger to the community and a flight risk, and in support thereof states as follows:

Defendant's Assault on a Law Enforcement Officer

On June 18, 2025, Yefferson Pinzon Suarez (Pinzon Suarez) was sentenced in St. Louis County Court to 100 days in jail upon conviction for the state crimes of felony Kidnapping, Domestic Violence and Unlawful Use of a Weapon. Earlier on March 19, 2025, an Immigration

Judge in Kansas City, Missouri, had ordered Pinzon Suarez to be removed from the United States. Pinzon Suarez has no legal status in the United States. After his sentencing, on June 20, 2025, Pinzon Suarez was taken into the custody of ICE agents at the St. Louis County Jail. Pinzon Suarez was brought to the Young Federal Building in downtown St. Louis. During the booking process for the removal order, Pinzon Suarez refused Deportation Officer Garza's request to cooperate during fingerprinting. Pinzon bit Officer Garza's left forearm and hit Officer Garza in the center of his chest. Officer Garza had bruising as a result of the attack.

Defendant's Criminal History

On December 12, 2024, the Defendant was arrested for felony Kidnapping, Weapons Offense, and Domestic Violence in St. Louis County, Missouri. On June 18, 2025, he was convicted of all three crimes and sentenced to 100 days jail time.

Defendant's Lack of Ties to the Community

Pinzon is a citizen of Columbia and has no status in the U.S. He was encountered by US Border Patrol on March 31, 2024, and given a notice to appear in immigration court. An Immigration Judge ordered his removal from the United States on March 19, 2025. The Defendant has little ties to the St. Louis area.

The Defendant's violent actions and criminal history represent that he is a danger to the community and his lack of ties to the community show he is a flight risk. Under these circumstances, there are simply no conditions or combination of conditions that could reasonably assure the safety of the community in the event Defendant was granted a bond. He should be detained pending resolution of his criminal case.

WHEREFORE, the Government requests pre-trial detention in this matter.

Respectfully submitted,

MATTHEW T. DRAKE
ACTING UNITED STATES ATTORNEY

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